



**Baker & McKenzie LLP**

815 Connecticut Avenue, N.W.  
Washington, D.C.  
20006 United States

Tel: +1 202 452 7000  
Fax: +1 202 452 7074  
[www.bakermckenzie.com](http://www.bakermckenzie.com)

George M. Clarke III  
Tel: +1 202 835 6184  
Fax: +1 202 416 7184  
[george.clarke@bakermckenzie.com](mailto:george.clarke@bakermckenzie.com)

**Asia Pacific**

Bangkok  
Beijing  
Hanoi  
Ho Chi Minh City  
Hong Kong  
Jakarta\*  
Kuala Lumpur\*  
Manila\*  
Melbourne  
Shanghai  
Singapore  
Sydney  
Taipei  
Tokyo

**Europe, Middle East  
& Africa**

Abu Dhabi  
Almaty  
Amsterdam  
Antwerp  
Bahrain  
Baku  
Barcelona  
Berlin  
Brussels  
Budapest  
Cairo  
Casablanca  
Doha  
Dusseldorf  
Frankfurt/Main  
Geneva  
Istanbul  
Johannesburg  
Kyiv  
London  
Luxembourg  
Madrid  
Milan  
Moscow  
Munich  
Paris  
Prague  
Riyadh  
Rome  
St. Petersburg  
Stockholm  
Vienna  
Warsaw  
Zurich

**Latin America**

Bogota  
Brasilia\*  
Buenos Aires  
Caracas  
Guadalajara  
Juarez  
Lima  
Mexico City  
Monterrey  
Porto Alegre\*  
Rio de Janeiro\*  
Santiago  
Sao Paulo\*  
Tijuana  
Valencia

**North America**

Chicago  
Dallas  
Houston  
Los Angeles  
Miami  
New York  
Palo Alto  
San Francisco  
Toronto  
Washington, DC

\* Associated Firm

March 01, 2021

**VIA CM/ECF**

The Honorable Stephanie A. Gallagher  
United States District Court  
For the District of Maryland  
101 West Lombard Street  
Baltimore, MD 21201

**Re: *Torrence v. Bartels, et al.*, Civil Action No. 1:20-cv-01223-SAG  
March 1, 2021 Deadlines**

Dear Judge Gallagher:

On behalf of Plaintiff Dwayne R. Torrence, Jr., and with the consent of Defendants' counsel, I write to memorialize the status of the case with respect to the March 1, 2021 deadlines outlined in the Court's December 2, 2020 Scheduling Order:

1. At this time, the parties do not request an early settlement or ADR conference. The parties are not able to meaningfully engage in settlement discussions until the case is further along.
2. The parties agree that Plaintiff shall be limited to 30 hours of depositions of fact witnesses and that Defendants shall be limited to 10 hours of depositions of fact witnesses.
3. There is no unanimous consent to proceed before a United States Magistrate Judge at this time. While Defendants are amenable, Plaintiff wishes to proceed before Your Honor.
4. The parties have met and conferred regarding the discovery of electronically stored information.

Respectfully,

/s/

George M. Clarke

**AGREED:**

/s/

Patricia H. Beall, Esq.  
Marks, O'Neill, O'Brien, Doherty &  
Kelly, P.C.  
600 Baltimore Avenue, Suite 305  
Towson, MD 21204

*Attorney for Defendants Bartels,  
Williams, Alenda, DeRosa, Awanga,  
Tatong, Hargraves, and Wright*